

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re INDYMAC MORTGAGE-BACKED  
SECURITIES LITIGATION

Master Docket No. 09-Civ. 04583 (LAK)  
ECF CASE

This Document Relates To:  
ALL ACTIONS

**DECLARATION OF PATRICK T. EGAN**

I, Patrick T. Egan, declare as follows pursuant to 28 U.S.C. § 1746:

1. I am a member of the law firm Berman DeValerio, Court-appointed Lead Counsel for Lead Plaintiffs Wyoming Retirement System and Wyoming State Treasurer (“Lead Plaintiffs”) and the proposed class in this Action. I am admitted to practice before this Court.

2. I respectfully submit this declaration in support of Lead Plaintiffs’ Amended Motion For Certification Of The Class For Purposes of Partial Settlement And For Approval of Notice To The Settlement Class. I have personal knowledge of the matters testified to herein.

3. Annexed hereto as Exhibit 1 is a true and correct copy of the Amended Stipulation and Agreement of Partial Settlement, dated July 31, 2012 (the “Amended Stipulation”). The Amended Stipulation contains several exhibits negotiated by the Settling Parties: the proposed Order Certifying the Class for Purposes of Partial Settlement and Approving Notice to the Settlement Class (Exhibit A); the notice (Exhibit A-1); the summary notice (Exhibit A-2); and the proposed judgment (Exhibit B).

4. Annexed hereto as Exhibit 2 is a true and correct copy of my firm’s resume.

5. Annexed hereto as Exhibit 3 is a true and correct copy of the First Amended Complaint for Interpleader dated July 27, 2012, filed in *Arch Insurance Co., et. al., v. Perry, et al.*, 12-CV-06290 (C.D. Cal. Western Division).

6. Annexed hereto as Exhibit 4 is a true and correct copy of the Second Amended Class Action Complaint for Violation of Sections 11, 12(a)(2) and 15 of the Securities Act of 1933, filed by Lead Plaintiffs in the Action on August 15, 2011 (without exhibits).

I hereby declare under penalty of perjury that the foregoing is true and correct.

Executed on July 31, 2012

/s/ Patrick T. Egan

PATRICK T. EGAN